Commonwealth of Massachusetts Department of Telecommunications and Energy Fitchburg Gas and Electric Light Company Docket Nos. D.T.E. 02-25

Attorney General's Second Set of Document and Information Requests

Request No. AG 2-2:

Please provide electronic versions (working models with all related and referenced spreadsheet models and data) of Mr. Harrison's marginal cost of service study (electric) in Excel or Lotus 123 format. The electronic versions must contain all formulae and permit the recalculation of Mr. Harrison's results. Describe of how each model/spreadsheet was constructed and operates (identify key variables, inputs and outputs).

Response:

The requested documents are confidential and represent preparatory information including trade secrets of Management Applications Consulting, Inc. This information is being provided with a clear understanding that this information is to remain confidential and that disclosure to the public domain is strictly prohibited. An executed confidentiality agreement will be in place before the requested materials will be provided. This program has been operated on a Windows 98 IBM compatible personal computer operating the Office 2000 version of Excel. The marginal cost study model represents the evolution of all prior marginal cost studies performed by MAC. In this spreadsheet are numerous formulae which were not used nor verified in the context of the current Fitchburg study. MAC makes no claims to the accuracy of these extraneous formulae. The marginal cost study does not use a set of input data as classically designed in main frame programs. Rather, it is a collection of interrelated spreadsheets accumulated on a single large worksheet for ease of linking information. Much of the input is shown on the tab labeled input, however, input data is found throughout the spreadsheet. Output data has been provided in hard copy as Exhibit JLH-3 (Electric).

Person Responsible: James L. Harrison